

GIBBONS P.C.

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Attorneys for the Cipolla Defendants

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC,

Debtor.

AIRN LIQUIDATION TRUST CO., LLC, in
its capacity as Liquidation Trustee of the
AIRN LIQUIDATION TRUST,

Plaintiff,

v.

JOSEPH CIPOLLA, CIPOLLA & CO., LLC,
CFA ASSURANCE SERVICES LLC, CFA
REVIEW SERVICES LLC, CFA TAX
SERVICES LLC, CIPOLLA FINANCIAL
ADVISORS LLC, and DOES 1-100,

Defendants.

Chapter 11

Case No. 22-14539 (JKS)

Hon. John K. Sherwood

Adv. Pro. No. 24-01097-JKS

**NOTICE OF MOTION OF CIPOLLA DEFENDANTS TO DISMISS
PLAINTIFF'S FIRST AMENDED ADVERSARY COMPLAINT
PURSUANT TO RULE 7012 OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE**

PLEASE TAKE NOTICE that Joseph Cipolla, Cipolla & Co., LLC, CFA Assurance Services LLC, CFA Review Services, LLC, CFA Tax Services, LLC and Cipolla Financial Advisors, LLC (collectively, the “**Cipolla Defendants**”), by and through their undersigned attorneys, Gibbons P.C., filed the *Motion of Cipolla Defendants to Dismiss Plaintiff’s First Amended Adversary Complaint Pursuant to Rule 7012 of the Federal Rules of Bankruptcy Procedure* (the “**Motion**”) with the United States Bankruptcy Court for the District of New Jersey (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Motion shall: (i) be in writing; (ii) set forth the specific basis thereof; (iii) be filed with the Clerk of the United States Bankruptcy Court for the District of New Jersey; and (iv) be served simultaneously upon the Cipolla Defendants’ undersigned counsel, together with proof of service thereof, so as to be actually received no later than **November 19, 2024** (the “**Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief sought in the Motion will be held on **November 26, 2024 at 10:00 a.m. (ET)** before the Honorable John K. Sherwood, United States Bankruptcy Judge for the District of New Jersey, in Courtroom 3D at the United States Bankruptcy Court for the District of New Jersey, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102.

PLEASE TAKE FURTHER NOTICE that unless a written response or objection is timely filed and simultaneously served in accordance with this Notice, it may not be considered by the Court. In the event no objections are filed and served by the Objection Deadline, the relief requested in the Motion may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that the Cipolla Defendants have submitted a proposed form of order herewith. Oral argument is requested in the event an objection is timely filed.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: November 4, 2024
Newark, New Jersey

GIBBONS P.C.

By: /s/ Robert K. Malone
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